



December 22, 2025

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

Re: Docket Number M-2025-3054271. Model Tariff for Customers at or over 50 MW Individually or 100 MW in the Aggregate. Submitted via e-File and pc-puc-tus-energy@pa.gov

Dear Secretary Homsher:

The Marcellus Shale Coalition (MSC), a regional trade association with a national membership, appreciates the opportunity to submit comments for consideration on the Tentative Order for the Model Tariff referenced above.

The MSC was formed in 2008 and is currently comprised of approximately 155 member companies who are fully committed to working with local, state and federal government officials and regulators to facilitate the development of the natural gas resources in the Marcellus, Utica and related geological formations. Our members represent many of the largest and most active companies in natural gas production, gathering, processing, transmission and utilization in the country, as well as the supply chain companies, contractors, professional service firms and skilled trades who work with the industry.

The MSC appreciates the intent of the Pennsylvania Public Utility Commission (PA PUC or Commission) to provide clarity and direction to large customers, including data centers, while providing protections for existing ratepayers on issues such as interconnection costs, interconnection studies and other factors related to customer interfacing with utilities. The MSC offers the following comments for the PA PUC's consideration.

Comments

1. In evaluating this issue and potential roles for the Commission, the MSC strongly encourages the Commission to continue its support for competitive electric supply markets to meet the needs of data centers and other large load customers. While this model tariff is important to establishing and managing baseline standards for these interconnections, it is driven largely by an understandable concern for whether there will be sufficient energy available – and in a manner that safeguards the interests of ratepayers – to meet this growing demand. To that end, this model tariff should be viewed in conjunction with the success of Pennsylvania's robust competitive supply markets, which the MSC believes provides the Commonwealth

with a competitive advantage to meeting this growing demand while simultaneously safeguarding ratepayers.

2. The term “Large Load Customer” references the phrase “multiple closely located customers”. The word “closely” is not defined but presumably references some distance of proximity of customers. Conversely, under the section entitled “Availability” the model tariff states that “*large load refers to a single commercial or industrial load facility or aggregation of load facilities at a **single site** that poses a reliability risk to the grid due to its size and operational characteristics.*” (Emphasis added).

The reference to large load under “Availability” implies that the demand is situated at a “single site”, which may conflict with the definition of “Large Load Customer” and the use of “multiple closely located customers.” Additionally, some of the details included under “Availability”, such as references that customers are commercial or industrial in nature, may be more appropriately included within the definition of “Large Load Customer”. Otherwise, it appears that some of the criteria for “Large Load Customers” may be found in the term’s definition, and other criteria elsewhere in the model tariff.

The MSC urges the Commission to reconcile the references of “closely located” and “single site” and to clarify the definition of “Large Load Customer”.

3. Under “Availability” the model tariff refers to Large Load Customers that “*pose[s] a reliability risk to the grid due to its size and operational characteristics.*” No guidance is provided which outlines why a “large load” – merely because of size – poses a reliability risk to the grid, and no guidance is provided with respect to what is meant by “operational characteristics.” The Commission is urged to clarify its intent with respect to these references.
4. The Commission is urged to clarify that this model tariff and its related obligations are only applicable to large load customers which seek to interconnect to the electric grid and are not applicable to data centers which solely rely on their own on-site generation to their project.

The MSC thanks the Commission for its consideration of these comments. Should you desire additional information or clarification, please do not hesitate to contact us.

Sincerely,



Jim Welty
President

